

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT

(1) PHILIP SANDERS, an)
Individual and Husband and Next)
of Kin of BRENDA JEAN SANDERS,)
Deceased,)

Plaintiff,)

- VS -

)Case No.:
)17-cv-492-JHP-FHM
)

(1) CREEK COUNTY BOARD OF COUNTY)
COMMISSIONERS, AND (2) SHERIFF)
BRET BOWLING, in his official)
capacity as Creek County)
Sheriff, AND (3) TURN KEY HEALTH)
CLINICS, a limited liability co.)

Defendants.)

DEPOSITION OF CHERYL GREEN, taken on behalf of
the Plaintiff, before Elise Grayson Cruchon,
Certified Shorthand Reporter, at 7447 South Lewis
Avenue, Tulsa, Oklahoma, on the 11th day of March,
2020, pursuant to stipulations of the parties.

ELISE GRAYSON CRUCHON, CSR

REPORTED BY:
Elise Grayson Cruchon, CSR
440 South Houston
Suite 114
Tulsa, Ok 74127

ELISE GRAYSON CRUCHON, CSR
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1 correct?

2 A. That is correct.

3 Q. Because above it, it says who signed Nurse
4 (RN) Green, C; do you see that?

5 A. Yeah, that's not me.

6 Q. You've got a lot better eyes than I've got.

7 Have you ever heard of a utilization
8 manager?

9 A. Utilization manager?

10 Q. Yes, ma'am.

11 A. No, I have not.

12 MR. RICHARDSON: That's all the
13 questions I got for you.

14 THE WITNESS: All righty.

15 MS. THOMPSON: I have just a few
16 questions to follow-up, and then you should be
17 done.

18 CROSS EXAMINATION

19 BY MS. THOMPSON:

20 Q. Cheryl, you're an LPN, not a doctor, correct?

21 A. Correct.

22 MR. RICHARDSON: Object to form.

23 Q. (BY MS. THOMPSON) You don't have any
24 physicians training?

25 A. I do not.

1 Q. Are you an APRN?

2 A. No, I'm not.

3 Q. Do you hold any other advanced practice
4 nursing degrees?

5 A. No, I do not.

6 Q. Are you trained to diagnose any disease?

7 A. No.

8 Q. Are you authorized to prescribe medications?

9 A. No.

10 Q. So when earlier you looked at different
11 conditions in medical records that the
12 Plaintiff's counsel, Mr. Richardson, had
13 showed you --

14 A. Uh-huh.

15 Q. -- and you did some spelling of those,
16 remember?

17 A. Yes.

18 Q. Are you trained to diagnose any of those
19 conditions?

20 A. No.

21 Q. Are you trained to treat any of those
22 conditions?

23 A. No.

24 Q. Do you recall observing Brenda Sanders having
25 any of those conditions?

1 MR. RICHARDSON: Objection to form.

2 A. No.

3 Q. (BY MS. THOMPSON) If you were to take a look
4 at the Turn Key Medical Intake Form that we
5 looked at earlier, do you have that in front
6 of you?

7 A. Yes.

8 Q. Okay. You had testified earlier that where it
9 says Medication, check boxes here said, no,
10 that one of them should be checked?

11 A. Correct.

12 Q. Looking at the rest of this form, can you
13 still tell whether or not Brenda Sanders was
14 on some medications at intake?

15 A. Yes.

16 Q. How can you tell that?

17 A. Down here it has the medications that she is
18 on -- that she told us she was on.

19 Q. So even though one of these boxes is not
20 checked, are you still able to know what the
21 answer is to that question based on this form?

22 A. Yes.

23 Q. What is that answer?

24 A. That she was on medications.

25 Q. And are those medications listed?